

VIA ECF

The Honorable Arun Subramanian
United States District Court, Southern District of New York
500 Pearl Street, Courtroom 15A
New York, NY 10007-1312

Re: *United States et al. v. Live Nation Entertainment, Inc. et al.*; 1:24-cv-03973-AS-SLC

Dear Judge Subramanian:

Pursuant to the Court's instruction at the October 29, 2024 conference, Defendants submit this letter to update the Court on the status of discovery.

- Defendants produced over 600,000 documents and over 33 million observations of data to Plaintiffs during their pre-Complaint investigation.¹
- Defendants' contract reviewers have reviewed approximately 1,061,000 documents for responsiveness to Plaintiffs' document requests since the September 27, 2024 discovery conference, including approximately 224,000 documents since Defendants' last update on November 8, 2024.
- Defendants have produced approximately 9,900 documents and over 12 billion observations of data covering 7 different countries in this litigation to date, including approximately 8,700 documents since Defendants' last update on November 8, 2024.
- Defendants expect to produce over 240,000 additional documents by early next week.

[signatures on following page]

¹ Defendants previously produced to Plaintiffs approximately 1.7 million documents between 2015 and 2019 in response to Plaintiffs' prior investigations.

Dated: November 22, 2024

Respectfully submitted,

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cc: All Counsel of Record (via ECF)